

CERTIFICATE OF SERVICE

Terence G. Banich, an attorney, certifies that he caused to be served a true copy of the above and foregoing notice and attached motion upon the Electronic Mail Notice List through the CM/ECF System which sent notification of such filing via electronic means or via prepaid United States First Class Mail, as indicated, on September 5, 2018.

/s/ Terence G. Banich

Mailing Information for Case No. 17-24063

Electronic Mail Notice List

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **Andrew D. Arons** arons@wbs-law.com; strubbe@wbs-law.com
- **Darlene Nowak** nowakdm81@gmail.com; strubbe@wbs-law.com
- **Greg Czaicki** greg@czaickilaw.com
- **Joel P. Fonferko** ND-One@il.cslegal.com
- **Cari A. Kauffman** ckauffman@sormanfrankel.com

Via U.S. First Class Mail

See attached creditor matrix

Label Matrix for local noticing

0752-1
Case 17-24063
Northern District of Illinois
Chicago
Wed Sep 5 09:48:19 CDT 2018

Mercedes-Benz Financial Services USA LLC
c/o BK Servicing, LLC
PO Box 131265
Roseville, MN 55113-0011

111 S WACKER DR GARAGE
111 S. Wacker Drive
Chicago, IL 60606-4302

AMAZON WEB SERVICES
410 Terry Avenue North
Seattle WA 98109-5210

AT&T
PO BOX 5019
CAROL STREAM, IL 60197-5019

AT&T
PO Box 6463
Carol Stream, IL 60197-6463

Adon Valdes
7206 Chadsford Court
Tampa, FL 33615-2573

Alabama Department of Revenue
P.O. Box 327320
Montgomery, AL 36132-7320

Alliant Credit Union
PO Box 66945 11545 W Touhy Ave
Chicago, IL 60666-0945

(p)SPRINGLEAF FINANCIAL SERVICES
P O BOX 3251
EVANSVILLE IN 47731-3251

Alliant Credit Union
c/o Greg Czaicki, Attorney at Law
77 West Washington Street
Suite 1313
Chicago, IL 60602-3236

U.S. BANK NATIONAL ASSOCIATION
c/o Codilis & Associates, P.C.
15W030 N. Frontage Road, Suite 100
Burr Ridge, IL 60527-6921

125 S. Wacker Property Owner LLC
75 Remittance Dr
Dept 3253
Chicago, IL 60675-3253

AMEX Merchant
200 Vesey Street
New York, NY 10285-3106

AT&T
PO Box 5011
Carol Stream, IL 60197-5011

AVG Technologies
1125 Innovation Drive
Ottawa, ON K2K 3G6
Canada

Aerohive Networks, Inc.
330 Gibraltar Drive
Sunnyvale, CA 94089-1326

Alan Jones
5017 Gato Del Sol Cir
Wesley Chapel, FL 33544-5509

AmeriCredit Financial Services, Inc., dba GM
P O Box 183853
Arlington, TX 76096-3853

American General Life Insurance
P.O. Box 305293
Nashville, TN 37230-5293

GTT COMMUNICATIONS, INC.
Williams, Bax & Saltzman
221 N. LaSalle, Suite 3700
Chicago, IL 60601-1508

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

ADT Security Services
PO Box 371878
Pittsburgh, PA 15250-7878

APOLLO STAFFING, INC.
1401 N. Central Expressway
Suite 208
Richardson, TX 75080-4460

AT&T
PO Box 5025
Carol Stream, IL 60197-5025

AWARENESS TECHNOLOGIES
88 Post Rd. West, 1st Floor
Westport, CT 06880-4208

Aflac
1932 Wynnton Road
Columbus, GA 31999-0002

(p)ALLIANT CREDIT UNION
BANKRUPTCY DEPARTMENT
11545 W TOUHY AVE
CHICAGO IL 60666-5000

American Express
PO Box 0001
Los Angeles, CA 90096-0001

Anixter
P.O. Box 847428
Dallas, TX 75284-7428

AppNeta
285 Summer Street 4th Floor
Boston, MA 02210-1518

Case 17-24063 Doc 62 Filed 09/05/18 Entered 09/05/18 10:25:04 Desc Main Document Page 4 of 20

AppRiver, LLC
1101 Gulf Breeze Parkway #200
Gulf Breeze, FL 32561-4858

Aquachill-Drinking Water Systems
PO Box 1965
Valrico, FL 33595-1965

Ariel Bouskila
Berkovitch & Bouskila, PLLC
40 Exchange Place, Suite 1306
New York, NY 10005-2743

Arkansas Secretary of State
1401 W. Capitol - Ste 250
Little Rock, AR 72201-2937

Arrow
13219 Collections Center Drive
Chicago, IL 60693-0132

Arrow Systems Integration, Inc.
PO Box 4869
Department #145
Houston, TX 77210-4869

Auctus Capital Partners, Inc.
125 S. Wacker Drive - Suite 2125
Chicago, IL 60606-4472

Barracuda
3175 Winchester Blvd
Campbell, CA 95008-6557

BillStream, L.L.C.
P.O. Box 20492
Oklahoma City, OK 73156-0492

Blue Cross Blue Shield
25550 Network Place
Chicago, IL 60673-1255

Bradley Dale
4610 N Armenia Ave
Tampa, FL 33603-2735

Bright House Networks
PO Box 30574
Tampa, FL 33630-3574

CNA Insurance
PO Box 790094
St. Louis, MO 63179-0094

CT Corporation System
111 Eighth Ave 13 Floor
New York NY 10011-5213

CTC*CONSTANTCONTACT.COM
1601 Trapelo Road
Waltham, MA 02451-7333

Callahan Management
125 S. Wacker Dr #210
Chicago, IL 60606-4442

Cash Crunch
30 Broad St, 12th FL
New York, NY 10004-2304

CenturyLink
PO BOX 52187
Phoenix, AZ 85072-2187

Cesar Brambila
4924 W Oakdale Ave
Chicago, IL 60641-5122

Chase
PO Box 15123
Wilmington, DE 19850-5123

Chicago Messenger Service
1600 S. Ashland Ave.
Chicago, IL 60608-2099

Christopher M. Heintskill
Levenfeld Pearlstein LP
2 N. LaSalle St. Suite 1300
Chicago, IL 60602-3709

Citrix
7414 Hollister Ave
Goleta, CA 93117-2583

Citrix Systems, Inc.
851 W. Cypress Creek Rd
Fort Lauderdale, FL 33309-2040

City of Chicago
121 North LaSalle St
Room 800
Chicago, IL 60602-1237

City of Chicago- Dept of Revenue
22149 Network Place
Chicago, IL 60673-1221

City of Tampa
2105 N. Nebraska Ave - PO Box 2
Tampa, FL 33602-2500

City of Tampa Utilities
PO Box 30191
Tampa, FL 33630-3191

CloudJumper
4575 Pecan Dr
3rd Fl.
Paducah, KY 42001-6752

Comcast
 100 W. Lucerne Circle - Suite 201
 Orlando, FL 32801-3718

Comcast
 3 Lincoln Center
 Document Page 5 of 20
 Attn: Bankruptcy Group
 Oakbrook Terrace, IL 60181-4204

Comcast
 PO Box 3002
 Southeastern, PA 19398-3002

Comcast
 PO Box 530098
 Atlanta, GA 30353-0098

Comcast Cable
 PO Box 3002
 Southeastern, PA 19398-3002

Comed
 PO Box 6111
 Carol Stream, IL 60197-6111

Commonwealth of Pennsylvania
 PO Box 61380
 Harrisburg, PA 17106-1380

Comptroller of Maryland
 110 Carroll Street
 Annapolis, MD 21411-0001

Comptroller of Maryland
 PO Box 2601
 Annapolis, MD 21404-2601

Comptroller of Maryland Rev Admin
 110 Carroll Street
 Annapolis, MD 21411-0001

(p)TEXAS COMPTROLLER OF PUBLIC ACCOUNTS
 REVENUE ACCOUNTING DIV - BANKRUPTCY SECTION
 PO BOX 13528
 AUSTIN TX 78711-3528

Comptroller of Public Accounts
 PO Box 149356
 Austin, TX 78714-9356

ConnectWise
 4110 George Road - Suite 200
 Tampa, FL 33634-7411

Connecticut TRS
 PO Box 223035
 Pittsburgh, PA 15251-2035

Continuum
 100 Summer Street
 Boston, MA 02110-2108

Cook County Treasurer
 Law Dep't.
 118 North Clark Street
 Chicago, IL 60602-1590

Corporation Division Dept of State
 107 North Main Street
 Concord, NH 03301-4989

Craters and Freighters
 14476 Duval Place West - Suite 705
 Jacksonville, FL 32218-9415

DC Treasurer Dept of Consumer
 PO Box 91360
 Washington, DC 20090-1360

Danny Conner
 1002 Brandon Lakes Ave
 Valrico, FL 33594-5805

Darlene M. Nowak
 Marcus & Shapira, LLP
 35th Floor, One Oxford Centre
 301 Grant St.
 Pittsburgh, PA 15219-1407

Data Trans
 510 W. Belmont #1911
 Chicago, IL 60657-6800

DataMotion, Inc.
 200 Park Ave - Suite 302
 Florham Park, NJ 07932-1040

Datto, Inc.
 101 Merritt 7
 Norwalk, CT 06851-1049

David M. Lesser & Associates
 855 West George St
 Ste 200
 Chicago, IL 60657-5113

David Smat
 2036 W. Barry
 Chicago, IL 60618-8215

Dearborn National Life Insurance
 36788 Eagle Way
 Chicago, IL 60678-1367

Dell Inc
 PO BOX 802816
 CHICAGO, IL 60680-2816

Delta Dental of Illinois
 PO BOX 804067
 CHICAGO, IL 60680-4067

Department of Consumer & Regulatory
 PO Box 91360
 Washington, DC 20090-1360

Department of Revenue Services
PO Box 2936
Hartford, CT 06104-2936

Dept of State Division of Corp
99 Washington Ave
Albany, NY 12210-2822

Direct Staffing Group LLC
1112 S. Birch Dr.
Mount Prospect, IL 60056-4502

Director of Revenue
State of Missouri
PO Box 360
Jefferson City, MO 65102-0360

Division of Corporations - Reg
PO Box 6327
Tallahassee, FL 32314-6327

DocuSign Inc.
PO Box 123428 - Dept. 3428
Dallas, TX 75312-3428

Double-Take Software, Inc.
Dept CH 10875
Palatine, IL 60055-0875

Expert Messenger
PO Box 1936
Pinellas Park, FL 33780-1936

FL Dept of Revenue
PO Box 6520
Tallahassee, FL 32314-6520

FP Mailing Solutions
PO Box 157
Bedford Park, IL 60499-0157

FedEx
PO BOX 94515
PALATINE, IL 60094-4515

FedEx-Ck
PO BOX 94515
PALATINE, IL 60094-4515

Federal Communications Commission
P.O. Box 358835
Pittsburgh, PA 15251-5835

Florida Department of Revenue
5050 W. Tennessee St
Tallahassee, FL 32399-0135

Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

Florida State Disbursement Unit
PO Box 8500
Tallahassee, FL 32314-8500

Fortinet
899 Kifer Road
Sunnyvale, CA 94086-5205

Franchise Tax Board
PO Box 942857
Sacramento, CA 94257-0531

FreedomVoice
169 Sacony Rd - Suite 212
Encinitas, CA 92024-6781

Frontier
PO Box 740407
Cincinnati, OH 45274-0407

Frontier
PO Box 92713
Rochester, NY 14692-8813

Frontier Comm of Oregon
P.O. Box 92713
Rochester, NY 14692-8813

GFC LEASING
P.O. BOX 2290
MADISON, WI 53701-2290

GMAC
PO Box 183834
Arlington, TX 76096-3834

GOLDCOASTINTERNET.NET
PO Box 195
Boca Raton, FL 33429-0195

GTT
7900 TysonsOne Place - Suite 1450
McLean, VA 22102-5973

GTT
One Place - Suite 1450
McLean, VA 22102

GTT
PO Box 842630
Dallas, TX 75284-2630

GTT - INETW01-IDC
PO Box 842630
Dallas, TX 75284-2630

GTT Communications, Inc.
c/o Darlene M. Nowak, Esq.
Marcus & Shapira, LLP
35th Fl. One Oxford Centre, 301 Grant St
Pittsburgh, PA 15219-6407

Georgia Department of Revenue
PO Box 740240
Atlanta, GA 30374-0240

Georgia Public Utility Service Comm
PO Box 954025
Atlanta, GA 31193-4025

Global Capacity
Lockbox 33029
Wholesale P.O. BOX 39000
SAN FRANCISCO, CA 94139-0001

Global Telecom & Technology
8484 Westpark Dr - Ste 720
McLean, VA 22102-3595

Gordon Flesch Company, Inc
P.O. Box 992
Madison, WI 53701-0992

Grange Indemnity Insurance Co
P.O. Box 88017
Chicago, IL 60680-1017

Granite Telecommunications
PO Box 983119
Boston, MA 02298-3119

HILLSBOROUGH CNTY
601 E. Kennedy Blvd
Tampa, FL 33602-4156

HiTech Compliance
3905 Tampa Road - Suite 213
Oldsmar, FL 34677-9710

Hillsborough County
601 E. Kennedy Blvd
Tampa, FL 33602-4156

Holland & Knight LLP
PO Box 864084
Orlando, FL 32886-4084

Hugh Clarke
8200 Adrina Shore Way
Boynton Beach, FL 33473-5009

Humana
PO Box 557
Carol Stream, IL 60132-0557

Hyde Park Bank
1525 E. 53rd St.
Chicago, IL 60615-4530

IL Dep of Employment Security
33 S. State Street, 10th Fl.
Chicago, IL 60603-2804

IMG Technologies, Inc.
Dept. 4393
Carol Stream, IL 60122-0001

INetworks Group, Inc.
125 S Wacker Dr #2510
Chicago, IL 60606-4415

INetworks Services, LLC
125 S. Wacker Dr. #2510
Chicago, IL 60606-4415

Illinois ASBO
108 Carroll Avenue
DeKalb, IL 60115-3014

Illinois Commerce Commission
527 East Capitol Ave.
Springfield, IL 62701-1813

Illinois Dep of Employment Security
Illinois Payment Control Division
POB 4385
Chicago, IL 60680-4385

(p) ILLINOIS DEPARTMENT OF REVENUE
BANKRUPTCY DEPARTMENT
P O BOX 64338
CHICAGO IL 60664-0338

Illinois Department of Revenue
PO Box 19045
Springfield, IL 62794-9045

Illinois Dept of Human Resources
100 South Grand Avenue East
Springfield, IL 62762-1000

Illinois Secretary of State
111 E. Monroe
Springfield, IL 62756-0001

Indiana Department of Revenue
Bankruptcy Section MS 108
100 N. Senate Ave N240
Indianapolis, IN 46204-2231

Ingram Cloud, Inc
P. O. Box 90341
Chicago, IL 60696-0341

(p) INGRAM MICRO INC
ATTN RECOVERY SERVICES
1759 WEHRLE DR
WILLIAMSVILLE NY 14221-7887

Innovative Gov't Telecom Solutions
125 S. Wacker Dr #2510
Chicago, IL 60606-4415

Insight Global, LLC
PO Box 198226
Atlanta, GA 30384-8226

InterPark
91144 Collection Center Drive
Chicago, IL 60693-0001

PO Box 7346
Philadelphia, PA 19101-7346

PO Box 62634
Baltimore, MD 21264-2631

J'son Cable
6715 Cambridge Park Drive
Apollo Beach, FL 33572-1720

JNIT Inc.
6203 N Flora Vista Ave
Tampa, FL 33604-6205

JP Extreme Hauling
5108 Carrollwood Meadows Dr.
Tampa, FL 33625-6454

Jan-Pro of Northern Illinois
136 Shore Drive
Burr Ridge, IL 60527-5890

Janeen Welsh
4812 W Roseland Ave
Peoria, IL 61604-5859

Janice Hamilton
3 Avon Court
Mackinaw, IL 61755-9768

Jeremy Nelson
c/o JNIT Inc.
6203 N. Flora Vista Ave.
Tampa, FL 33604-6205

Jive
CH 19606
Palatine, IL 6055-9606

John Connors
224 Marlberry Circle
Jupiter, FL 33458-2848

Jones Lang LaSalle
10 Park Avenue
Morristown, NJ 07960-4700

Jori Mitchell
8413 Horizon Court
Tinley Park, IL 60487-3648

Jose Castellon
9004 W 89th Street
Hickory Hills, IL 60457-1207

KFORCE
1001 East Palm Avenue
Tampa, FL 33605-3551

KIA Motors Finance
PO Box 650805
Dallas, TX 75265-0805

Kane Family Limited Partnership
1509 W. Berwyn Avenue - Suite 200
Chicago, IL 60640-8167

Kansas Corporation Commission
1500 SW Arrowhead Rd.
Topeka, KS 66604-4029

Keith White
8434 East Palm Lane
Scottsdale, AZ 85257-2951

Kelly Terpenning
11109 Blue Magnolia Ln
Parrish, FL 34219-2914

Kentucky Department of Revenue
P.O. Box 5222
Frankfort, KY 40620-0021

Kevin Marquardt
851 N Hoyne Ave, Apt 3F
Chicago, IL 60622-7209

Khaled Okla
14030 Laramie Avenue, # 1712A
Crestwood, IL 60418-1651

Kings Cash Group
30 Broad St., 12th FL
New York, NY 10004-2902

Klarian Capital Group
855 West George St
Suite 200
Chicago, IL 60657-5113

Labtech Software LLC
4110 George Road - Suite 200
Tampa, FL 33634-7411

Level (3)
PO Box 910182
Denver, CO 80291-0182

Life Start Wellness Network
125 S. Wacker Dr.
Suite 200
Chicago, IL 60606-4442

Lifeboat Distribution
PO Box 3826
Carol Stream, IL 60132-3826

LiveWire Electrical Systems Inc.
12900 S. Throop
Calumet Park, IL 60827-6424

LogMeIn
320 Summer Street
Boston, MA 02210-1701

Louisville Metro Revenue Commission
PO Box 35410
Louisville, KY 40232-5410

MEBCO, Inc.
PO Box 560066
Montverde, FL 34756-0066

MOZY
2162 W Grove Pkwy
PLEASANT GROVE, UT 84062-6728

MXAlerts
148 W. 37th Street - 6th Floor
New York, NY 10018-6984

Manage2Win
7075 Redwood Blvd. - Suite L
Novato, CA 94945-4136

Massachusetts Department of Revenue
P.O. Box 7025
Boston, MA 02204-7025

Matex LLC
5 Graymoor Ln.
Olympia Fields, IL 60461-1221

Matex LLC
6 Graymoor Ln.
Olympia Fields, IL 60461-1201

Matthew Levy
5 Graymoor Ln
Olympia Fields, IL 60461-1221

Matthew Ward
453 Sterlington road
Columbia, SC 29212-3338

MegaPath
PO Box 120324
Dallas, TX 75312-0324

Mercedes Financial
PO Box 685
Roanoke, TX 76262-0685

MetTel
PO Box 9660
Manchester, NH 03108-9660

Michael Coburn
16419 Magnolia Bluff Dr
Montverde, FL 34756-3508

Michael Gardener
6601 NW 20th Street
Margate, FL 33063-2101

Michael O'Neill
510 N Blue Lake Ave
Deland, FL 32724-3918

Michigan Dept. of Licensing & Reg
PO Box 30054
Lansing, MI 48909-7554

Microsoft Corporation
10 Microsoft Way
Redmond, WA 98073

Mimecast
Department CH 10922
PALATINE, IL 60055-0922

Minnesota Department of Revenue
Mail Station 6330
St. Paul, MN 55146-6330

Minnesota Secretary of State
60 Empire Drive - Suite 100
St Paul, MN 55103-2141

Mississippi Secretary of State
PO Box 136
Jackson, MS 39205-0136

Mississippi Department of Revenue
PO Box 23075
Jackson, MS 39225-3075

Municipal Assoc. South Carolina
PO Box 60489
Charlotte, NC 28260-0489

My Pro Bookkeepers, Inc.
100 Tower Dr
Suite 224
Burr Ridge, IL 60527-5778

NETGEAR
350 E. Plumeria Drive
San Jose, CA 95134-1911

NH DRA Audit Division
PO Box 457
Concord, NH 03302-0457

National Funding, Inc.
9820 Towne Center Dr
San Diego, CA 92121-1944

National Funding, Inc.
c/o Neal Salisian
550 S Hope St #750
Los Angeles, CA 90071-2686

Netria Corporation
PO Box 4110
Woburn, MA 01888-4110

NeuStar, Inc.
P.O. Box 403034
Atlanta, GA 30384-3034

New Dimensions High School
4900 Old Pleasant Hill Road
Kissimmee, FL 34759-3430

New England Fiber, Inc
2150 Washington St
Suite 100
Newton, MA 02462-1450

New Jersey Department of Revenue
P.O. Box 245
Trenton, NJ 08695-0245

New York Department of Revenue
PO Box 22094
Albanay, NY 12201-2094

NoaNet
PO BOX 13
Spokane, WA 99210-0013

North Carolina Department of Rev
PO Box 25000
Raleigh, NC 27640-0520

North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, NC 27699-4325

NowAccount Networks Corporation
2300 Peachtree Rd, NW
Suite C-102
Atlanta, GA 30309-1122

OWN WEB NOW CORP
8131 Vineland Avenue
Orlando, FL 32821-6847

Office of Ohio Consumers' Council
10 W. Broad Street - Suite 1800
Columbus, OH 43215-3420

Office of Tax and Revenue
PO Box 96019
Washington, DC 20090-6019

Ohio Department of Taxation
P.O. Box 182101
Columbus, OH 43218-2101

Ohio Treasurer of State
P.O. Box 182101
Columbus, OH 43218-2101

OpenDNS
135 Bluxome St.
San Francisco, CA 94107-1507

Oracle Systems Corporation
P.O. Box 203448
Dallas, TX 75320-3448

Oregon Dept. of Revenue
PO Box 14780
Salem, OR 97309-0469

Oregon Public Utility Commission
P.O. Box 2153
Salem, OR 97308-2153

PA Department of Revenue
P.O. Box 280418
Harrisburg, PA 17128-0418

PA Department of Revenue
PO Box 280427
Harrisburg, PA 17128-0427

PA Department of Revenue
PO Box 280504
Harrisburg, PA 17128-0504

PA Dept of Revenue
PO Box 280407
Harrisburg, PA 17128-0407

PA USF
PO Box 360395
Petttsburg, PA 15251-6395

PAETEC
P.O. Box 9001013
Louisville, KY 40290-1013

PAETEC
PO Box 9001013
Louisville, KY 40290-1013

Paychex
1000 East Warrenville Rd #200
Naperville, IL 60563-3574

Peoples Gas
PO Box 19100
Green Bay, WI 54307-9100

Peppertree Ocean Club Homeowners
c/o Patton Hospitality Management
One Vance Gap Road Asheville, NC 28805

Personnel Concepts
P.O. Box 5750
Carol Stream, IL 60197-5750

Prince George's County Government
14741 Governor Oden Bowie Dr.
Suite 1090
Upper Marlboro, MD 20772-3043

ProTech Professional
975 Airbrake Ave.
Turtle Creek, PA 15145-1815

Public Regulation Commission-NM
224 East Palace Ave
Santa Fe, NM 87501-2056

Public Service Comm of Maryland
16th Floor 6 St. Paul Street
Baltimore, MD 21225

Public Service Comm of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

Public Utilities Comm of Hawaii
465 S. King St
Room 103
Honolulu, HI 96813-2910

Public Utilities Comm of Nevada
1150 E. William St.
Carson City, NV 89701-3109

Public Utilities Comm of Oregon
PO Box 2153
Salem, OR 97308-2153

Public Utilities Commission of Ohio
180 E Broad St
Columbus, OH 43215-3763

Quest Software, Inc.
4 Polaris Way
Aliso Viejo, CA 92656-5356

QuoteWorks
7680 Universal Blvd. - Suite 360
Orlando, FL 32819-8949

RI Dep of State Div of Business
148 W. River Street
Providence, RI 02904-2615

RI Division of Taxation
One Capitol Hill
Providence, RI 02908-5801

RSM US LLP
5155 Paysphere Circle
Chicago, IL 60674-0051

Rapid Advance Financial Services,
4500 E West Highway, 6th FL
Bethesda, MD 20814-3327

Raymond Cowley
740 Cooper Court E
Aurora, IL 60504-7219

ReadyRefresh by Nestle
PO Box 856680
Louisville, KY 40285-6680

Realty & Mortgage Co.
1509 W. Berwyn Ave - Suite 200
Chicago, IL 60640-8167

Republic Services
PO Box 9001154
Louisville, KY 40290-1154

Rhode Island Department Of Revenue
One Capital Hill
Suite 9
Providence, RI 02908-5807

Rhode Island Dept. of Revenue
PO Box 9702
Providence, RI 02940-9702

Rhode Island Division of Taxation
One Capital Hill
Suite 9
Providence, RI 02908-5811

Rhode Island Division of Taxation
One Capitol Hill
Providence, RI 02908-5803

Rhonda Okleshen
10758 Voss Dr
Orland Park, IL 60467-8415

Robert Half Technology
12400 Collections Center Drive
Chicago, IL 60693-0124

SC Office of Regulatory Staff
1401 Main St.
Suite 900
Columbia, SC 29201-2954

SCREENCONNECT SOFTWARE
4110 George Road, Suite 200
Tampa, FL 33634-7411

SLACK
155 5th St
SAN FRANCISCO, CA 94103-2919

Salvador Gonzalez
1405 W Fuller
Chicago, IL 60608-5407

Sangamon County ETSE
2000 Shale Ave
Springfield, IL 62703-5694

Saulray LLC
8317 N Armenia Ave
Tampa, FL 33604-2733

Saulray LLC & Christopher H. Norman
Hines Norman Hines PL
315 S Hyde Park Ave
Tampa, FL 33606-2289

Screenconnect Software
4110 George Road, Suite 200
Tampa, FL 33634-7411

Sean Humphries
2844 N. Orchard, Apt 37
Chicago, IL 60657-5237

Secretary of State
213 State Capitol
Springfield, IL 62756-0001

Secretary of State
PO Box 94608
Lincoln, NE 68509-4608

Secretary of State - CA
PO Box 944228
Sacramento, CA 94244-2280

Secretary of State Business Svc
302 W. Washington St. - Rm E018
Indianapolis, IN 46204-2700

Secretary of State Business Svc
P.O. Box 5616
Montgomery, AL 36103-5616

Secretary, Public Service Comm
160 E. 300 South
Suite 400
Salt Lake City, UT 84111-2305

SecurEnvoy
Basing View
Basingstoke, Hampshire RG21 4EB
United Kingdom

SecurEnvoy Limited
Brunel Road Theale
Reading Berkshire, RG7 4AB
United Kingdom

Shared Solutions and Services, Inc
PO Box 4869
Department #145
Houston, TX 77210-4869

Sharon Leach
520 2nd Ave SE
Lutz, FL 33549-4325

Sheri Mock
5150 Bethany Lane
Haverhill, FL 33415-1279

ShoreTel
4921 Solution Center
Chicago, IL 6077-4009

Siegel & Callahan, P.C.
20 N Clark St. Suite 2200
Chicago, IL 60602-5113

Smart Sheet
10500 NE 8th St - Suite 1300
Bellevue, WA 98004-4312

Social Finance (SoFi)
375 Healdsburg Ave #280
Healdsburg, CA 95448-4151

Solix Inc - IN USF
PO Box 223509
Pittsburg, PA 15251-2509

Solix Inc-AZUSF
30 Lanidex Plaza West
PO Box 685
Parsippany, NJ 07054-0685

Solix, Inc. TUSF Administrator
100 S. Jefferson Rd
P.O. Box 902
Whippany, NJ 07981-0902

South Carolina Dept. of Rev.
300A Outlet Pointe Blvd.
PO Box 125
Columbia, SC 29202-0125

South Carolina Dept. of Revenue
301 Gervais Street
PO Box 125
Columbia, SC 29202-0125

South Carolina Office of Regulatory
1401 Main St.
Ste 900
Columbia, SC 29201-2954

South Dakota Department of Revenue
PO Box 5055
Sioux Falls, SD 57117-5055

South Dakota Networks
2900 West 10th Street
Sioux Falls, SD 57104-2543

South Dakota Public Utilities Comm
500 E. Capitol Ave
Pierre, SD 57501-5007

South Dakota Utilities Commission
500 E. Capitol Ave
Pierre, SD 57501-5007

(p) SPRINT NEXTEL CORRESPONDENCE
ATTN BANKRUPTCY DEPT
PO BOX 7949
OVERLAND PARK KS 66207-0949

St. Andrews Catholic High School
1710 W Addison St
Chicago, IL 60613-3580

St. Ignatius College Prep
1076 W Roosevelt Road
Chicago, IL 60608-1531

Staples Advantage
PO Box 83689
Chicago, IL 60696-3689

State Comptroller
111 E. 17th Street
Austin, TX 78774-0100

State of Alabama
P.O. Box 327790
Montgomery, AL 36132-7790

State of Arkansas
7th & Wolf St
P.O. Box 896
Little Rock, AR 72203-0896

State of Colorado TRS Services
1560 Broadway
Ste 250
Denver, CO 80202-5143

State of Maryland
301 W. Preston Street
Baltimore, MD 21201-2395

State of Maryland Personal Property
301 W. Preston Street - Rm 801
Baltimore, MD 21201-2395

State of Michigan
7150 Harris Drive
PO Box 30221
Lansing, MI 48909-7721

State of New Hampshire
P.O. Box 457
Concord, NH 03302-0457

State of Rhode Island
89 Jefferson Blvd
Warwick, RI 02888-1046

State of Rhode Island Dept. of Rev
PO Box 9702
Providence, RI 02940-9702

State of Rhode Island/ Accounting
89 Jefferson Blvd.
Warwick, RI 02888-1046

State of Wisconsin
Drawer 978
Milwaukee, WI 53293-0978

Stratus Networks
4700 N. Prospect Rd - Suite 8
Peoria Heights, IL 61616-6468

Sure Payroll
2350 Ravine Way - Suite 100
Glenview, IL 60025-7621

Synnex Corporation
5845 Collections Center Dr
Chicago, IL 60693-0058

Targeted Accessibility Fund of NY
14 Corporate Woods Blvd #215
Albany, NY 12211-2523

Taxation and Revenue Dept
PO Box 25128
Santa Fe, NM 87504-5128

Tech Data
25121 Network Place
Chicago, IL 60673-1251

Tech Data
P.O. Box 277847
Atlanta, FL

Teco Tampa Electric
PO Box 31318
Tampa, FL 33631-3318

Tel-Star Cablevision, Inc.
1295 Lourdes Rd.
Metamora, IL 61548-7710

Tennessee Department of Revenue
State Office Building
500 Deaderick Street
Nashville, TN 37242-0001

Tennessee Regulatory Authority
502 Deaderick Street
4th Fl
Nashville, TN 37243-0200

The Cogent Group, Inc. - CCI
c/o Tim Woodcock
2321 Marina Drive W, Apt. 105
Fort Lauderdale, FL 33312

The Hartford
PO Box 660916
Dallas, TX 75266-0916

ThreatTrack Security, Inc.
311 Park Place Blvd - Suite 300
Clearwater, FL 33759-3994

Tim Woodcock
2321 Marina Bay Drive W
Apt. 105
Fort Lauderdale, FL 33312-2329

Tina Smat
2036 W. Barry Ave
Chicago, IL 60618-8215

Tracey Levy
5 Graymoor Ln
Olympia Fields, IL 60461-1221

Trans-Video, Inc
56 Depot Sq. - Ste. 4
Northfield, VT 05663-1627

Transamerica Occidental Life
P.O. Box 742528
Cincinnati, OH 45274-2528

Travelers
PO Box 660317
Dallas, TX 75266-0317

Treasurer, State of Vermont
112 State Street
Montpelier, VT 05620-2601

Tsungirirai Ludy
6407 El Rancho Rd
Louisville, KY 40291-4521

ULINE
PO BOX 88741
CHICAGO, IL 60680-1741

UPS
Lockbox 577
Carol Stream, IL 60132-0577

(p)US BANK
PO BOX 5229
CINCINNATI OH 45201-5229

Universal Service Administrative Co
PO Box 105056
Atlanta, GA 30348-5056

Utah Division of Public Utilities
PO Box 146751
Salt Lake City, UT 84114-6751

Utah State Tax Commission
210 N. 1950 W.
Salt Lake City, UT 84134-0130

VA Dept of Taxation
PO Box 26627
Richmond, VA 23261-6627

VMware
3401 Hillview Ave
Palo Alto, CA 94304-1383

Verizon
P.O. Box 25505
Lehigh Valley, PA 18002-5505

Verizon
P.O. Box 371873
Pittsburgh, PA 15250-7873

Verizon
P.O. Box 4832
Trenton, NJ 08650-4832

Verizon
PO Box 660072
Dallas, TX 75266-0072

Vermont Department of Taxes
133 State Street
Montpelier, VT 05633-1401

Vermont Treasurer of State
133 State Street
Montpelier, VT 05633-1401

Vermont USF
PO Box 780018
Philadelphia, PA 19178-0018

Vickram Budhram
3405 Glossy Leaf Lane
Clermont, FL 34711-7154

(p)VIRGINIA DEPARTMENT OF TAXATION
P O BOX 2156
RICHMOND VA 23218-2156

Vision Service Plan of Illinois, NFP
3333 Quality Drive
Rancho Cordova, CA 95670-7985

Vision Solutions
15300 Barranca Parkway
Irvine, CA 92618-2200

WA UTC
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-0001

WWW.LOGMEIN.COM
320 Summer Street
Boston, MA 02210-1701

Washington State Department of Rev
PO Box 34051
Seattle, WA 98124-1051

William Classen
9516 Northwest 80th Court
Tamarac, FL 33321-1351

William Gerth
104 Oakwood Dr
Maitland, FL 32751-3324

William Okleshen
10758 Voss Dr
Orland Park, IL 60467-8415

Windstream
P.O. Box 9001111
Louisville, KY 40290-1111

Windstream
PO Box 9001950
Louisville, KY 40290-1950

Winncom Technologies
PO BOX 536658
Pittsburg, PA 15253-5908

Wisconsin Department of Revenue
PO Box 8908
Madison, WI 53708-8908

Work Market
7 High Street
Huntington, NY 11743-7605

XEROX
25720 Network Place
Chicago, IL 60673-1257

XO Communications
14239 Collections Center Drive
Chicago, IL 60693-0142

Zenefits
North Tower, 303 2nd St #401
San Francisco, CA 94107-1366

ePlan Services
4300 Kittredge St. #100
Denver, CO 80239-5804

iNETWORKS Group Inc.
125 S. Wacker Dr - Ste 2510
Chicago, IL 60606-4415

(p)METRONET
4575 PECAN DR
3RD FLOOR
PADUCAH KY 42001-6752

Alex D Moglia ESQ
Moglia Advisors
1325 Remington Rd, Ste H
Schaumburg, IL 60173-4815

David J Smat
2036 W. Barry Ave
Chicago, IL 60618-8215

Ira Bodenstein
Fox Rothschild
321 N. Clark Street
Suite 800
Chicago, IL 60654-4766

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Richard M. Fogel
Fox Rothschild
321 N Clark St., Suite 800
Chicago, IL 60654-4766

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Alliant Credit Union
PO Box 66945
11545 W Toughy Ave
Chicago, IL 60666

American General Life
P.O. Box 0798
Carol Stream, IL 60132-0798

Comptroller of Public Accounts
P.O. Box 149348
Austin, TX 78714-9348

Illinois Department of Revenue
100 W. Randolph
Bankruptcy Section L 7-425
Chicago, IL 60602

(d)Illinois Department of Revenue
Bankruptcy Unit
P.O. Box 19035
Springfield, IL 62794-9035

Ingram Micro, Inc.
1759 Wehrle Drive
Williamsville, NY 14221

(d) Ingram Micro, Inc.
PO Box 90341
Chicago, IL 60696-0341

Sprint
PO Box 54977
Los Angeles, CA 90054-0977

US Bank
P.O. Box 1800
Saint Paul, MN 55101-0800

(d) US Bank
PO Box 790408
St. Louis, MO 65179-0406

(d) USBank
4801 Fredericka St
Owensboro, KY 42301

Virginia Department of Taxation
PO Box 1500
Richmond, VA 23218-1500

nGenx
4575 Pecan Dr
3rd Floor
Paducah, KY 42001

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) AMERICREDIT FINANCIAL SERVICES, INC. d/b/a

(d) American Express
PO Box 0001
Los Angeles, CA 90096-8000

(d) Inetworks Group, INC
125 S. Wacker Dr. #2510
Chicago, IL 60606-4415

(d) Mercedes-Benz Financial Services USA LLC
c/o BK Servicing, LLC
PO Box 131265
Roseville, MN 55113-0011

(d) PA Dept. of Revenue
PO Box 280407
Harrisburg, PA 17128-0427

End of Label Matrix
Mailable recipients 378
Bypassed recipients 5
Total 383

balances due on invoices going back to the beginning of the year (the “Receivable”), the majority of which is related to an adversary proceeding that arises in the Bankruptcy Case (the “Adversary Proceeding”) commenced by one of the Debtor’s creditors, GTT Communications, Inc. (“GTT”).¹ The Debtor has advised the Movants that he does not presently have the means to pay all or even a meaningful part of that balance. Moreover, although the Debtor is employed, his compensation is largely contingent on his future performance, so the Debtor does not know if he will soon have sufficient income to pay the Receivable, let alone fees for future work that the Firm would provide.

5. The Movants have discussed the Receivable with the Debtor on multiple occasions and recently have expressly advised him that they intend to withdraw their appearances due to his inability to retire the Receivable or pay for the Firm’s future services. Since then, the Debtor has not indicated that his financial circumstances have improved or identified any third party willing to pay the Receivable and fund the defense of the Adversary Proceeding.

Relief Requested

6. The Movants require leave of court to withdraw their appearances. LBR 2091-1(A) (“[a]n attorney of record may not withdraw, nor may any other attorney file an appearance on behalf of the same party or as a substitute for the attorney of record, without first obtaining leave of court by motion ... Any motion to withdraw must be served on the client as well as all parties of record.”). As discussed below, there is a recognized basis to grant the Motion.

7. The impetus for the Motion is straightforward: the Debtor has not paid the Firm for its past legal services, and he has no apparent ability to pay any fees incurred going forward. “Litigants have no right to free legal aid in civil suits.” *Fidelity Nat’l Title Ins. Co. of N.Y. v. Intercounty Nat’l Title Ins. Co.*, 310 F.3d 537, 540 (7th Cir. 2002) (reversing order denying counsel

¹ Adv. No. 17-00547. The Firm’s attorneys who appeared as counsel for the Debtor in the Adversary Proceeding are also seeking leave to withdraw.

leave to withdraw due to the client's non-payment). The applicable ethical rules expressly permit a lawyer to withdraw when the client fails to pay. The American Bar Association's Model Rules of Professional Conduct, which this Court has adopted through LBR 9029-4A, provide in relevant part:

(b) Except as stated in paragraph (c), a lawyer may withdraw from representing a client if: ... (5) the client fails substantially to fulfill an obligation to the lawyer regarding the lawyer's services and has been given reasonable warning that the lawyer will withdraw unless the obligation is fulfilled; [and] (6) the representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client[.]

ABA MODEL R. PROF'L CONDUCT 1.16(b)(5), (6). Clauses (5) and (6) of Rule 1.16(b) effectively mean that "lawyers are entitled to stop working when clients stop paying." *Fidelity Nat'l Title*, 310 F.3d at 540; *see also City of Joliet v. Mid-City Nat'l Bank of Chicago*, 998 F. Supp. 2d 689, 692 (N.D. Ill. 2014).

8. Here, as discussed above, the Debtor is indebted to the Firm and has no apparent ability to pay the Firm for the services that will be required to defend the Adversary Proceeding. The Debtor's failure to pay the Firm's invoices violates the Retention Agreement, and triggers the Firm's right to terminate its representation of him. Movants, moreover, have given the Debtor multiple warnings that his failure to pay the Receivable would result in them seeking leave to withdraw. This satisfies Rule 1.16(b)(5). *Fidelity Nat'l Title*, 310 F.3d at 540; *Mid-City Nat'l Bank*, 998 F. Supp. 2d at 692-93. And, as discussed in greater detail in the motion to withdraw filed in the Adversary Proceeding, GTT plans to prosecute the Adversary Proceeding over the next several months, which would require the Firm to provide a substantial amount of services to the Debtor and vastly increase the amount that the Debtor owes to the Firm. This would clearly result in an "unreasonable financial burden" on the Firm, so Rule 1.16(b)(6) is thus satisfied as well. *Fidelity Nat'l Title*, 310 F.3d at 540; *Mid-City Nat'l Bank*, 998 F. Supp. 2d at 692-93.

9. Accordingly, the Movants respectfully submit that, under these circumstances, it is appropriate to grant them leave to withdraw their appearances for the Debtor.

Service

10. Pursuant to LBR 2091-1(A), Movants have served the Debtor and all parties of record with a copy of this Motion.

WHEREFORE, the Movants respectfully request that the Court enter an order: (a) granting the Motion; (b) withdrawing the appearances of Ira Bodenstein and Richard M. Fogel; and (c) granting such further relief as the Court deems necessary and appropriate.

Dated: September 5, 2018

Respectfully submitted,

s/Ira Bodenstein

Ira Bodenstein (#3126857)
Richard M. Fogel (#3127114)
Fox Rothschild LLP
321 N. Clark, Suite 800
Chicago, Illinois 60654
(312) 541-0151
ibodenstein@foxrothschild.com
rfogel@foxrothschild.com

